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10 *Attorneys for Defendant,*  
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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

20 U.S. BANK N.A., SUCCESSOR  
21 TRUSTEE TO BANK OF AMERICA,  
22 N.A., SUCCESSOR IN INTEREST TO  
23 LASALLE BANK N.A., ON BEHALF OF  
24 THE REGISTERED HOLDERS OF BEAR  
25 STEARNS ASSET BACKED  
SECURITIES I LLC, ASSET-BACKED  
CERTIFICATES, SERIES 2005-HE6,

26 Plaintiff,

27 vs.

28 TERRAFIRMA VENTURE LLC, a Nevada  
corporation; TREASURES LANDSCAPE  
MAINTENANCE ASSOCIATION, a  
Nevada non-profit corporation,

Defendants.

CASE NO.: 2:17-cv-01890-JCM-NJK

**STIPULATION AND ORDER TO  
EXTEND TIME TO FILE RESPONSE  
TO PLAINTIFF'S COMPLAINT**

20 Defendant TREASURES LANDSCAPE MAINTENANCE ASSOCIATION  
21 ("HOA"), and Plaintiff U.S. BANK N.A., SUCCESSOR TRUSTEE TO BANK OF  
22 AMERICA, N.A., SUCCESSOR IN INTEREST TO LASALLE BANK N.A., ON BEHALF  
23 OF THE REGISTERED HOLDERS OF BEAR STEARNS ASSET BACKED  
24 SECURITIES I LLC, ASSET-BACKED CERTIFICATES, SERIES 2005-HE6 (U.S.  
25 BANK, N.A.), by and through their respective counsel, hereby agree and stipulate as  
26 follows:

27 IT IS HEREBY AGREED AND STIPULATED, that the deadline for HOA to  
28 Respond to Plaintiff U.S. BANK, N.A.'s Complaint shall be extended to **November 16**,

1           **2017.** The HOA's Response was originally due on October 26, 2017, however, counsel  
2 for the HOA has just recently been retained in this matter and requires additional time to  
3 analyze Plaintiff's claims.

4           This is the HOA's first request for an extension of these deadlines and is not  
5 intended for the purposes of prejudice or delay.  
6

7           DATED this 25<sup>th</sup> day of October, 2017.

8           LIPSON, NEILSON, COLE, SELTZER &  
9           GARIN, P.C.

10          */s/ Kaleb D. Anderson*

11          By:

12          Kaleb D. Anderson, Esq. (Bar # 7582  
13           9900 Covington Cross Dr., Suite 120  
14           Las Vegas, NV 89144

15          *Attorneys for Defendant  
16           Treasures Landscape Maintenance  
17           Association*

18          DATED this 25<sup>th</sup> day of October, 2017.

19          BALLARD SPAHR, LLP

20          */s/ Justin A. Shiroff*

21          By:

22          Justin A. Shiroff, Esq. (Bar #12869)  
23           100 North City Parkway, Suite 1750  
24           Las Vegas, NV 89106

25          *Attorney for Plaintiff*

15           **ORDER**

16           IT IS SO ORDERED.

17          DATED this 26th day of October, 2017.

18            
19           **UNITED STATES MAGISTRATE JUDGE**

20          Submitted by:

21          LIPSON, NEILSON, COLE, SELTZER & GARIN, P.C.

22          */s/ Kaleb D. Anderson*

23          By:

24          Kaleb D. Anderson, Esq. (Bar # 7582  
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26           Las Vegas, NV 89144

27          *Attorneys for Defendant  
28           Treasures Landscape Maintenance Association*